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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$23,505.00 IN
U.S. CURRENCY,

15 Defendant.
16

2:24-MC-00025-DJC-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant Gal
19 Yifrach (“claimant”), by and through their respective counsel, as follows:

20 1. On or about October 26, 2023, claimant filed a claim in the administrative forfeiture
21 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$23,505.00 in
22 U.S. Currency (hereafter “defendant currency”), which was seized on or about July 27, 2023.

23 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
24 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
25 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
26 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was January 24, 2024.

4 4. By *Amended* Stipulation and Order filed January 26, 2024, the parties stipulated to extend
5 to April 23, 2024, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
7 subject to forfeiture.

8 5. By Stipulation and Order filed April 23, 2024, the parties stipulated to extend to June 21,
9 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. By Stipulation and Order filed June 18, 2024, the parties stipulated to extend to July 22,
13 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

16 7. By Stipulation and Order filed July 23, 2024, the parties stipulated to extend to October
17 21, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
18 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
19 forfeiture.

20 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
21 to December 20, 2024, the time in which the United States is required to file a civil complaint for
22 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
23 currency is subject to forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to December 20, 2024.

4 Dated: 10/18/2024

PHILLIP A. TALBERT
United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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9 Dated: 10/18/2024

/s/ Richard M. Barnett
RICHARD M. BARNETT
Attorney for potential claimant
Gal Yifrach

(Signature authorized by email)

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14 **IT IS SO ORDERED.**

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16 Dated: October 21, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE